## **REMARKS**

Claims 1-16 were previously pending in the application. By the Amendment, Claims 12-15 are canceled without prejudice, new Claims 17-22 have been added, and Claims 1-11 and 16 remain unchanged.

Claims 1-7, 10, 12 and 14-15 were rejected under 35 USC §103(a) as being unpatentable over Tung (US 5,953,938) in view of Bronander (US 1,773,167). Claims 8-9 were rejected under 35 USC §103(a) as being unpatentable over Tung, in view of Bronander, and further in view of Shibuya (JP 8-49161). Claim 11 was rejected under 35 USC §103(a) as being unpatentable over Tung, in view of Bronander, and further in view of Shibuya. Claim 13 was rejected under 35 USC §103(a) as being unpatentable over Tung, in view of Bronander, and further in view of Nelson (US 5,404,848). Claim 16 was rejected under 35 USC §103(a) as being unpatentable over Bronander in view of Nelson.

Claims 1-7, 10, 12 and 14-15 were rejected under 35 USC §103(a) as being unpatentable over Tung in view of Henry (US 6,473,998). Claims 8-9 were rejected under 35 USC §103(a) as being unpatentable over Tung, in view of Henry, and further in view of Shibuya. Claim 11 was rejected under 35 USC §103(a) as being unpatentable over Tung, in view of Henry, and further in view of Shibuya. Claim 13 was rejected under 35 USC §103(a) as being unpatentable over Tung, in view of Henry, and further in view of Nelson (US 5,404,848). Claim 16 was rejected under 35 USC §103(a) as being unpatentable over Henry in view of Nelson.

Claims 1-7 and 10 were rejected under 35 USC §103(a) as being unpatentable over Tung in view of Eriksson (US 2,817,227). Claims 8-9 were rejected under 35 USC §103(a) as being unpatentable over Tung, in view of Eriksson, and further in view of Shibuya. Claim 11 was rejected under 35 USC §103(a) as being unpatentable over Tung, in view of Eriksson, and further in view of Shibuya. Claims 12 and 14-15 were rejected under 35 USC §103(a) as being unpatentable over Tung in view of Eriksson and further in view of Bronander or Henry. Claim 13 was rejected under 35 USC §103(a) as being unpatentable over Tung, in view of Eriksson, and further in view of Bronander or Henry, and yet further in view of Nelson (US 5,404,848). Claim 16 was rejected under 35 USC

§103(a) as being unpatentable over Eriksson in view of Nelson and further in view of Bronander or Henry.

Independent Claim 1 recites a method of removing moisture from items of clothing, which comprises: bringing an item of clothing into contact with at least one absorbent body of an absorbent material in the form of a continuous strand; moving the at least one absorbent body and the item of clothing at the same speed; and subsequently separating the item of clothing from the at least one absorbent body.

Tung discloses a cloth washing apparatus having a transmission device (40), a rinsing device (50), a squeezing device (60), an ironing device (70) with a heating drum (71), and a folding machine (80). The squeezing device (60) includes rollers (61) and a conveyor belt (62). The piece of cloth passes through upper squeezing rollers (63) and lower squeezing rollers (64) to remove water from the cloth.

The Examiner contends that it would have been obvious to modify Tung to substitute an absorbent material for the conveyor of Tung (62). The Examiner then provides a variety of references, including Bronander, Henry and Eriksson, and contends that each of these references disclose an absorbent material that could be substituted for the conveyor (62) of Tung. Applicants respectfully disagree and request reconsideration.

Initially, Applicants note that Henry does not disclose an absorbent material. Rather, Henry discloses that the conveyor (4) is made from a material permeable to air and water, such as perforated synthetic rubber, a mesh of textile or metallic filaments, or by a perforated metal strip. (See col. 2, lines 36-44). The water permeable conveyor (4) of Henry is clearly not an absorbent body, and Applicants respectfully request all rejections involving the Henry reference be withdrawn.

Regarding Tung, it would not be obvious to modify Tung to substitute an absorbent material for the conveyor (62) because there is no reason to make this modification. Tung already discloses the squeezing rollers (63, 64) that remove the water and dry the cloth. (See col. 3, lines 46-51) As disclosed in Tung, the squeezing rollers (63, 64) already perform the function of drying the cloth. There is no reason to provide an additional absorbent body to duplicate the drying function of the squeezing rollers (63, 64). Modifying Tung to include an additional means for performing the drying function

would make the device *less efficient*, not more efficient, because there is no reason for this unnecessary modification.

In addition, it would not have been obvious to make the Examiner's proposed modification because the modification would render Tung completely unsatisfactory for its intended purpose. As described above, the squeezing rollers (63, 64) perform the function of drying the cloth by squeezing the water out of the cloth. The intended purpose of this portion of Tung is to remove the water from the cloth. This removed water must go somewhere, and water inherently drains downwardly due to gravity. As shown in Fig. 3-5 of Tung, the cloth are supported on top of the conveyor (62). If the conveyor (62) was made from an absorbent material, the water squeezed out of the cloth would immediately be absorbed by the conveyor (62) adjacent the squeezing rollers (63, 64). This water would then be exposed back to the cloth, which would defeat the purpose of squeezing the water from the cloth in the first place.

Also, as shown in Figs. 3-5, the conveyor (62) continues its path back below the squeezing rollers (63, 64). Water from the cloth that is not absorbed back into conveyor (62) on the upper run immediately adjacent the rollers would drain downwardly and be absorbed below on the lower run of the conveyor (62). The saturated conveyor (62) would then continue to bring the water back around and expose the new cloth to even more moisture. This would further defeat the purpose of squeezing water from the cloth and would further decrease the efficiency of the drying process. While Tung is silent on the specific material of the conveyor (62), based on the remaining disclosure of Tung, Applicants believe the conveyor (62) must be made from a water permeable or mesh-type material to permit proper drainage of the water removed from the cloth by the squeezing rollers (63, 64). Therefore, Tung would be rendered unsatisfactory for its intended purpose and the proposed modification would not have been obvious.

For these and other reasons, Tung and Bronander, Henry or Eriksson, either alone or in combination, do not teach or suggest the subject matter defined by independent Claim 1. Therefore, Claim 1 is allowable. Claims 2, 5-10 and 17-18 depend from Claim 1 and are allowable for the same reasons and also because they recite additional patentable subject matter.

Independent Claim 3 recites a method of removing moisture from items of clothing, which comprises: bringing an item of clothing into contact with at least one absorbent body of an absorbent material in the form of a continuous strand; moving the at least one absorbent body and the item of clothing at the same speed; subsequently separating the item of clothing from the at least one absorbent body; removing moisture from the absorbent body following contact with the item of clothing; providing the absorbent body with a plurality of sections; and successively bringing individual sections of the absorbent body into contact with the item of clothing, separating the section from the item of clothing, and removing moisture from the item of clothing.

Independent Claim 3 recites all the features of Claim 1, as well as additional features. Therefore, all the arguments above in relation to Claim 1 are also applicable to Claim 3.

In addition, Claim 3 recites "removing moisture from the absorbent body following contact with the item of clothing." The Examiner's proposed modification of substituting an absorbent material for the conveyor (62) of Tung does not disclose this feature. As shown in Fig. 3-5 of Tung, the cloth remains in contact with the conveyor (62) after passing through the squeezing rollers (63, 64). Even if the conveyor (62) could be substituted with an absorbent body and if the squeezing rollers (63, 64) did remove moisture from the conveyor (62), this would not take place "following contact with the item of clothing." Therefore, all the elements of the claim are not disclose by the proposed combination.

For these and other reasons, Tung and Bronander, Henry or Eriksson, either alone or in combination, do not teach or suggest the subject matter defined by independent Claim 3. Therefore, Claim 3 is allowable. Claim 4 depends from Claim 1 and is allowable for the same reasons and also because it recites additional patentable subject matter.

Independent Claim 11 also recites "removing moisture from the absorbent body following contact with the item of clothing." Therefore, all the arguments above in relation to Claim 3 are also applicable to Claim 11.

Applicants respectfully submit that Nelson is non-analogous prior art. Nelson is not in the field Applicants' endeavor and is not reasonably pertinent to the particular

problem with which the inventor was concerned. Nelson discloses an automobile oil drip pad and is not in the field of clothes washing or laundry. In addition, Nelson discloses a stationary pad. The pad of Nelson merely lies stationary waiting for oil to drip onto the pad. This is not reasonably pertinent to providing a moving absorbent body for removing water from clothing. A person of ordinary skill in the art of clothes washing would not reasonably be expected or motivated to look to the art of automotive oil pans to solve the problems of clothes washing.

Furthermore, Nelson teaches away from the proposed combination. Nelson teaches an absorbent pad filled with oil, which is clearly not desirable when one is trying to clean clothes. In addition, Nelson teaches that the pad *repels water*, not absorbs water. "The absorbent pad absorbs oil and other petroleum products but not water, which it repels." (See col. 2, lines 27-29). Therefore, it would not have been obvious to combine Nelson with any of the other reference that relate to clothes washing. Applicants respectfully request the rejections involving the Nelson reference be withdrawn.

New independent Claim 19 recites a clothes washing device comprising: a housing; a transporting device supporting multiple items of clothing for movement along a travel path within the housing; two absorbent bodies disposed within the housing, each absorbent body including an absorbent material in the form of a continuous strand extending in a vertical direction between upper and lower rollers and being movable about the upper and lower rollers, the travel path extending between the absorbent bodies and the conveying device bringing the items of clothing into contact with the absorbent bodies, the absorbent bodies moving about the upper and lower rollers at the same speed as the item of clothing moving along the travel path; and a pressure exerting roller contacting the items of clothing with said at least one absorbent body.

The prior art, particularly Tung, Bronander, Shibuya, Henry, Eriksson and Nelson, does not disclose a clothes washing device, as recited in Claim 19. More specifically, the prior art does not disclose, among other things, two absorbent bodies disposed within the housing, each absorbent body including an absorbent material in the form of a continuous strand extending in a vertical direction between upper and lower rollers and being movable about the upper and lower rollers, the travel path extending between the absorbent bodies and the conveying device bringing the items of clothing

into contact with the absorbent bodies, the absorbent bodies moving about the upper and lower rollers at the same speed as the item of clothing moving along the travel path.

Therefore, Applicants respectfully request allowance of independent Claim 19. Claims 20-22 depend from Claim 19 and should be allowed for the same reasons and also because they recite additional patentable subject matter.

## **CONCLUSION**

In view of the above, entry of the present Amendment and allowance of Claims 1-11 and 16-22 are respectfully requested. If the Examiner has any questions regarding this amendment, the Examiner is requested to contact the undersigned. If an extension of time for this paper is required, petition for extension is herewith made.

Respectfully submitted,

Registration No. 48,557

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BSH Home Appliances Corp. 100 Bosch Blvd New Bern, NC 28562

Phone: 252-672-7930

Fax:

714-845-2807

email: craig.loest@bshg.com

Attorney Docket No.: 2001P12032WOUS

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Signature

Craig J. Loest, Registration No. 48,557

Printed Name

BSH Home Appliances Corp.

100 Bosch Blvd

New Bern, NC 28562 Phone: 252-672-7930

Fax: 714-845-2807 craig.loest@bshg.com